

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Floyd Little, et al. v. National Football League, et al. (Plaintiffs Ricky Hunley and Camille Moore-Hunley ONLY)

Court File No. 2:12-cv-02219-AB

**PETITION TO ESTABLISH  
ATTORNEY'S LIEN**

Petitioner, Brian C. Gudmundson for Zimmerman Reed LLP ("Zimmerman Reed"), pursuant to Minn. Stat. § 481.13 and pursuant to the executed Agreement for Legal Services section titled "Termination" petitions and states as follows:

1. Petitioner is an attorney at law admitted to practice before the courts of Minnesota and files this Petition to establish a lien for attorneys' fees as set forth herein.

2. On or about February 22, 2012, Plaintiffs Ricky Hunley and Camille Moore-Hunley retained Zimmerman Reed, pursuant to an agreement for legal services, to pursue a claim for injuries and damages allegedly caused by the National Football League's conduct associated with football-related concussions and head and brain injuries.

3. Regarding attorneys' fees, the agreement for legal services states, among other things: "If no recovery (by settlement or trial) is obtained client will not owe a legal

fee. If Zimmerman Reed obtains a settlement or judgment for Client, Client will pay to Zimmerman Reed twenty percent (20%) of the gross recovery plus reimbursement of expenses.”

4. When Zimmerman Reed entered into a contract with Plaintiffs, it entered into the risk and expense of the litigation before any settlement discussion had been held. Pursuant to this agreement, Zimmerman Reed filed a Complaint on Plaintiffs’ behalf on April 24, 2012, which is the subject of the instant action.

5. From the date Plaintiffs authorized Zimmerman Reed to proceed on their behalf, Zimmerman Reed actively and diligently investigated, prepared, and pursued Plaintiffs’ claims, and took all steps necessary to prosecute those claims, including, but not limited to, the preparation and filing of complaints, correspondence and communications with the clients, preparation and review of clients’ factual and legal circumstances, retaining experts, drafting and providing client updates, analyzing Plaintiff’s medical status and need for medical testing, obtaining medical testing through the Baseline Assessment Program, and more.

6. During the litigation, Zimmerman Reed partner, Charles S. Zimmerman, served on the Plaintiffs’ Steering Committee, which also inured to the Plaintiffs’ benefit.

7. Plaintiffs have retained new counsel to represent them in this action, which Plaintiffs communicated to the Claims Administrator, and which the Claims Administrator communicated to Zimmerman Reed.

8. Plaintiffs did not terminate Zimmerman Reed due to any malfeasance or other improper action.

9. Zimmerman Reed claims the right to have a lien for attorneys' fees and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiffs in this action.

WHEREFORE, the Petitioner prays:

1. That an attorney's lien be established;
2. That the amount of the lien be determined;
3. That the Court order that Zimmerman Reed be entitled to enforce an attorney's lien against the proceeds to be derived from any settlement or judgment in this action;
4. That the Defendant or the Defendant's insurer be prohibited from paying to the Plaintiffs any sums of money until said lien has been satisfied; and
5. For such other further relief as this Court deems just.

Dated: December 15, 2022

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson  
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**CERTIFICATE OF SERVICE**

I hereby certify that I caused the foregoing Petition to Establish Attorney's Lien to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania, on all parties registered for CM/ECF in the litigation.

Dated: December 15, 2022

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson  
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